

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC. and)
HONEYWELL INTELLECTUAL PROPERTIES)
INC.,)
)
Plaintiff,) C.A. No. 04-1338 (KAJ)
)
v.)
)
APPLE COMPUTER, INC., et al.,)
)
Defendants.)

**AFFIDAVIT OF MICHAEL D. OKERLUND IN SUPPORT OF
HONEYWELL'S OPPOSITION TO DEFENDANT ST-LCD'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION**

STATE OF MINNESOTA)
)
) SS:
COUNTY OF HENNEPIN)

I, Michael D. Okerlund, do hereby declare and state as follows:

1. I am one of the attorneys representing the Plaintiffs in this matter. I am submitting this Affidavit in Support of Honeywell's Opposition to Defendant ST-LCD's Motion to Dismiss for Lack of Personal Jurisdiction. I believe that the documents attached to this Affidavit as Exhibits are true and accurate copies of what they purport to be.

2. Attached as Exhibit A is a true and correct copy of an informational brochure entitled "Sony + Toyoda: A Genetic Arrangement for Craftsmanship – Towards a new LCD Age," published on Sony's website.

3. Attached as Exhibit B is a true and correct copy of a webpage published on Sony's website entitled "Sony Style."

4. Attached as Exhibit C is a true and correct copy of an excerpt from a financial Report published Sony, published online at www.sony.net/SonyInfo/IR/financial/fr/qfhh7c000000ky52-att/00q2_sony.pdf.

5. Attached as Exhibit D is a true and correct copy of a October 20, 2004 press release published on Sony's website.

6. Attached as Exhibit E is a true and correct copy of a March 8, 2001 press release published on Sony's website.

7. Attached as Exhibit F is a true and correct copy of an April 21, 2004 press release published on Sony's website.

8. Attached as Exhibit G is a true and correct copy of a webpage published by Best Buy.

9. Attached as Exhibit H is a true and correct copy of Sony products available on Circuit City's website.

10. Attached as Exhibit I is a true and correct copy of Sony's "Sony Style" webpage, listing 165 products matching the search "LCD"

11. Attached as Exhibit J is a true and correct copy of a CompUSA "Customer Copy Ship Confirmation List" showing products shipped to Wilmington, Delaware.

12. Attached as Exhibit K is a true and correct copy of a "DEX" address search result for Circuit City, as well as a receipt for products purchased at that store.

13. Attached as Exhibit L is a true and correct copy of a "DEX" address search result for Ritz Camera, as well as a receipt for products purchased at the Ritz Store

located in Wilmington, Delaware, and receipts for purchases made at CompUSA and Circuit City.



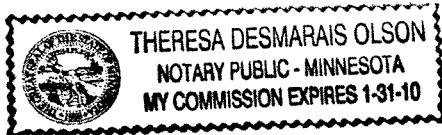
Michael D. Okerlund

SUBSCRIBED and sworn to before
me this 27th day of February, 2006.



Notary Public

My Commission Expires on:



508746

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to the following: John R. Alison, Parker H. Bagley, Robert J. Benson, Robert Karl Beste, III, Elizabeth L. Brann, Christopher E. Chalsen, Arthur G. Connolly, III, Frederick L. Cottrell, III, Francis DiGiovanni, Thomas M. Dunham, Amy Elizabeth Evans, York M. Faulkner, Christopher J. Gaspar, Alexander E. Gasser, Alan M. Grimaldi, Thomas C. Grimm, Thomas Lee Halkowski, Richard L. Horwitz, Robert J. Katzenstein, Nelson M. Kee, Richard D. Kelly, Stephen S. Korniczky, Hamilton Loeb, David J. Margules, David Ellis Moore, Carolyn E. Morris, Arthur I. Neustadt, Elizabeth A. Niemeyer, Gerard M. O'Rourke, Andrew M. Ollis, Karen L. Pascale, Adam Wyatt Poff, Leslie A. Polizoti, Alana A. Prills, Steven J. Rizzi, Avelyn M. Ross, Philip A. Rovner, Carl E. Schlier, John M. Seaman, Chad Michael Shandler, John W. Shaw, William J. Wade, Roderick B. Williams and Edward R. Yoches.

I further certify that I caused true and correct copies of the foregoing to be served on the following in the manner indicated:

BY HAND

John W. Shaw
YOUNG CONAWAY STARGATT & TAYLOR, LLP
The Brandywine Building, 17th Floor
1000 West Street
Wilmington, DE 19801

BY FEDERAL EXPRESS

John Flock
KENYON & KENYON LLP
One Broadway
New York, NY 10004

/s/ Leslie A. Polizoti (#4299)

MORRIS, NICHOLS, ARSHT & TUNNELL LLP
1201 North Market Street
Wilmington, DE 19801
(302) 658-9200
lpolizoti@mnat.com